email to: planning@infrastructure-ni.gov.uk

Dear Sir/Madam,

I wish to make the following submission to the Transboundary Consultation in respect of Dalradian's proposed gold mine in the Sperrins Area of Outstanding Natural Beauty.
First and foremost, can I state that I believe a proper Transboundary Consultation cannot be done while there is no agreement about where the boundary is. Furthermore, the Irish government and the Crown Estate England both claim ownership of Lough Foyle. This has been in dispute for over 100 years, since partition in 1922. This unique situation makes it impossible to submit a complete submission until the matter of ownership is resolved and the boundary is clearly identified.

Additionally, it is unacceptable to expect a submission to be completed without the benefit of a HRA (Habitats Regulations Assessment) - which has not been provided by DfI for the proposed goldmine (only the powerlines received an HRA). This is an important document, the absence of which creates a fundamental impediment to progressing this Transboundary Consultation exercise.

Without prejudice to these opening points there are many reasons to object to this proposed goldmine and I will focus on the unacceptable risks to the economy.

Fishing

There are a number of ways in which the waters of the River Foyle and Lough Foyle would be affected by Dalradian Gold's proposed goldmine. These are: through the inevitable failure of the huge 54 metre high 'Dry Stack Facility' containing the mine waste sliding down the mountain and following the path of the river to the Irish Sea; acid mine drainage; the proposed discharges of metals & "treated sewage" into the headwaters of the River Foyle; abstraction of vast quantities of water from the peatland; and "the closure plan" which reveals that contaminated water will be discharged into the Foyle River system from the mine adit in perpetuity.

With the likelihood that the river water and aquatic life, particularly salmon, will be adversely affected by the contamination from this mine, the livelihoods and incomes of fisher people risk significant adverse impacts from toxic contamination on both sides of the border.

Furthermore, the heavy duty powerline applied for by Dalradian Gold would cross several rivers, either by directional drilling or open channel cutting, which could impact water quality and disrupt aquatic ecosystems and have an adverse knock-on impact on the Foyle as these rivers are its tributaries and headwaters.

Agriculture

Toxic dust from the gold mining operations would include: the heavy metals such as arsenic and mercury from the waste dump/"Dry Stack Facility;" ammonium nitrate from using explosives twice a day every day of the year for 20-25 years; radioactive contaminants from the radon gas released from blasting a mine 900 metres deep; and fine particulate matter, Carbon Monoxide and Nitrogen Oxides from the 3.5 million litres of diesel applied for to be used on site every year for 20-25 years. This toxic dust would be blown about in the air by the strong winds and could easily travel long distances from the proposed goldmine. People remember the sand from the Sahara desert and the red dust from Aughinish aluminium mine in Limerick which blew over Ireland a number of years ago, so the threat to the whole island is evident.

The toxic dust would also settle on the grass that is eaten by cattle, sheep and other farm animals. Animals and crops would be affected by the contaminated water (referred to above) and the toxic dust from the proposed goldmine so that milk and other farm produce would no longer be fit for human consumption and could not be sold. This would have a significant adverse impact on the livelihoods of farmers and farm families not just in counties Tyrone, Derry and Donegal but across other counties in the Republic who rely on their farm produce- such as beef, dairy, chicken, eggs and crops - for their economic viability.

Tourism

Many people come to the Sperrins from across the island and beyond for walking or hiking, birdwatching, cultural history, archaeology and sightseeing. The history of the North West includes the first settlement of humans on the island and the last flight of the Celtic Chiefs; this could be the basis for a cross-border tourism project in future years. Indeed, many tourists unofficially follow this stream currently, looking for connections with their cultural heritage. The tourism industry in the Sperrins is at a critical stage in its early development. Dalradian Gold's proposals for mining not just at Greencastle but right across the Sperrins risks undermining a key foundation for rural tourism here (the unspoilt natural beauty and green /clean image of this place).

The heavy-duty powerline that would accompany the mine would result in significant negative visual and landscape impacts from 322 poles being erected 11-20 metres in height and a 10 metre clearance around them, going through the Sperrins Area of Outstanding Natural Beauty (AONB). People from Donegal & the Republic of Ireland (RoI) travel to Derry, Strabane, Omagh & through other parts of Tyrone regularly and would object to such an obtrusive construction on the AONB, as it would be like a scar on the beautiful landscape. It would damage the attractiveness of the Sperrins as a tourist destination and thus negatively impact tourism as a revenue source for the Sperrins AONB.

The multiple vehicles associated with the construction and maintenance of the proposed powerline, as indicated in the RPS Report, would lead to traffic congestion on the roads and increased risks of accidents. It would also deter people from visiting the area, thus affecting tourism.

People may also have concerns for their health from exposure to electromagnetic fields from the high voltage powerline. The World Health Organisation (WHO) classified magnetic fields in 2002 as "possibly carcinogenic to humans," and many research studies support this claim. As a result, a percentage of potential tourists would avoid the area.

Does ROI Want an Extractive Economy?

The EIA Directive states alternatives must be considered - have alternatives to mining been considered? Our governments North and South advertise that 'Ireland is Open for Business' - we are considered as one island in the eyes of the mining industry, with many of the same companies present on both sides of the border and when it suits our governments, as they sell us off at the annual PDAC mining conference in Toronto. If this major mining project goes ahead in the North, it will open the doors for an intensification of mining in the South, and an entrenchment of the extractive economy that is destroying communities and precious ecosystems, and bringing us Climate Breakdown. 25% of Northern Ireland and 27% of RoI has already been given out to mining companies under prospecting licences. This number fluctuates and is likely to increase as proposals to issue new prospecting licences are currently out for consultation in both ROI and NI.

In addition to the two economies already being closely intertwined, there is a high probability of constitutional change - bringing both jurisdictions into one, within the proposed lifetime of the mine. Once extractive companies are in the door, it is very hard to get them out. So what is permitted in the North now may soon be the responsibility of the entire island. What kind of economy, what kind of society, do we want to create for this new Ireland? One that destroys life or one that sustains life and promotes well-being of people and place.

Despite narratives of wealth generation, extractive projects around the world extract wealth from their host countries, are unstable and follow extreme boom and bust cycles (this is also true in the Irish case[1]) and create "enclave economies" (that do not serve the local economy) as seen in both Rosia Montană, Romania and Chalkidiki, Greece. Dalradian's project will extract wealth to the private equity company[2] who ultimately owns them, with the Crown Estate receiving 4% of the royalties (due to the colonial fact precious metals in the North are still owned by the Crown Estate). The extractive and neoliberal economic model in the North and South of Ireland has led to extreme levels of social inequality and degraded ecosystems, inviting in more transnational corporations will only entrench these consequences for people and place. Therefore, this project must be rejected.

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[1] For examples of how this has played out in Ireland with mining see this report prepared for the public inquiry

[2] In 2018, Dalradian Resources Inc. was bought over by Orion Resource Partners, a New York Based investment fund, removing it from the Toronto Stock Exchange. The boss of Orion, Oskar Lewnowski, has the ultimate control over the company. Orion Mining Finance is based in Delaware but has subsidiaries in key tax havens such as the Cayman Islands where companies do not have to disclose financial details. In November 2023, Dalradian entered into a purchase agreement with Wheaton Precious Metals (WPM) that guarantees WPM will buy a certain proportion of the gold produced, thereby de-risking Orion's investment. Investment funds like Orion operate by buying up the royalties to mining projects like Curraghinalt in the early stages, speculating that over their duration the value of such royalties will be far in excess of the initial capital investment. This is fundamentally about financial speculation, with Orion managing $8 billion worth of assets globally.

Alternatives are being championed by communities around the island from degrowth, solidarity economy, circular economy, well-being economy, Rights of Nature and Rights of Communities. These are the development pathways that will achieve real and just wealth for the island of Ireland.

Conclusion

When one considers the enormity of all of the above and the cumulative long-term impacts on the economy of Ireland, the Precautionary Principle must be applied and Dalradian's applications refused in their entirety.

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Date 23/4/25